

## **EXHIBIT A**

**Exhibit A- Bettachi**

The witness, Robert J. Bettachi (also referred to as "he"), shall be required to bring to the deposition the following documents:

1. Each document or other piece of information which relates to the Safe Buildings Alliance.
2. Each document or other piece of information which relates to the involvement (whether directly or indirectly) of W.R. Grace & Co. with the Safe Buildings Alliance, including, without limitation, involvement with any staff, consultants, lobbyist, attorneys or other member of the Safe Buildings Alliance.